

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

SUSAN COONEY,)
Plaintiff)
)
v.)
)
SAYBROOK GRADUATE SCHOOL AND)
RESEARCH CENTER,)
Defendant)

**PLAINTIFF SUSAN COONEY'S MOTION TO EXTEND DEADLINE TO
OPPOSE DEFENDANT SAYBROOK'S MOTION FOR SUMMARY JUDGMENT**
(WITH ASSENT OF DEFENDANT'S COUNSEL)

Plaintiff Susan Cooney, by her counsel, requests that the Court extend the deadline for plaintiff to oppose the Rule 56 Motion of Defendant Saybrook Graduate School and Research Center ("Saybrook") until September 12, 2006. As grounds in support of this motion, plaintiff states as follows:

1. Defendant Saybrook, by its counsel, filed the aforementioned motion electronically on August 21, 2006. Pursuant to the Local Rules, plaintiff's opposition is due on September 5, 2006.

2. During the fourteen-day period to prepare an opposition, plaintiff's counsel, Paul W. Morenberg, was away from the office for six vacation days that were scheduled well before defendant's motion was filed.

3. Due to these vacation plans, plaintiff's counsel requires additional time to prepare an Opposition to Defendant's Rule 56 motion. Plaintiff's counsel has conferred with defendants' counsel, Michael Aylward, who assents to plaintiff's request for a seven-day extension to oppose the Rule 56 motion.

WHEREFORE, Plaintiff respectfully requests that the Court extend the time for Plaintiff to oppose Defendant's Motion for Summary Judgment until September 12, 2006.

Respectfully submitted,
by Plaintiffs' Counsel

/s/ Paul W. Morenberg, BBO # 631101

Assented to:
By Defendants' Counsel

/s/ Michael F. Aylward, BBO # 024850*

E. Steven Coren, BBO # 099740
Paul W. Morenberg, BBO # 631101
Kerstein, Coren, Lichtenstein & Finkel, LLP
60 Walnut Street
Wellesley, MA 02481
(781) 997-1600

Michael F. Aylward, BBO # 024850
Grace V. Bacon Garcia, BBO # 640970
Morrison Mahoney LLP
250 Summer Street
Boston, MA 02210
(617) 439-7500

* Attorney Aylward authorized plaintiff's counsel to note his assent to plaintiff's motion in an e-mail dated September 2, 2006.

Dated: September 5, 2006